

Mr. Richard L. Happ
Fowler Specialty Packaging, Inc.
P.O. Box 692
Fowler, IN 47944

Dear Mr. Happ:

Re: Exempt Construction and Operation Status,
007-11776-00010

The application from Fowler Specialty Packaging, Inc., received on January 18, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following flexographic tail printer, to be located at 407 South Adeway Road, Fowler, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) flexographic tail printer, identified as TP-49, utilizing water based inks, with a maximum line speed of 250 feet per minute and a maximum printing width of twenty-eight (28) inches, exhausting to the plant atmosphere.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This existing source has been issued a Title V Operating Permit on March 30, 1998.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Spahi

cc: File - Benton County
Benton County Health Department
Air Compliance - Eric Courtright
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for an *Exemption*

Source Background and Description

Source Name: *Fowler Specialty Packaging, Inc.*
Source Location: *407 South Adeway Road, Fowler, Indiana 47944*
County: *Benton*
SIC Code: *2671*
Operation Permit No.: *007-11776-00010*
Permit Reviewer: *Spahi*

The Office of Air Management (OAM) has reviewed an application from Fowler Specialty Packaging, Inc. relating to the construction and operation of one(1) flexographic tail printer.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) flexographic tail printer, identified as TP-49, utilizing water based inks, with a maximum line speed of 250 feet per minute and a maximum printing width of twenty-eight (28) inches, exhausting to the plant atmosphere.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) First Minor Permit Modification 007-9795-00050, issued on June 2, 1999;
- (b) Registration 007-10026-00050, issued on December 3, 1998 and;
- (c) Title V Operating Permit 007-7645-00010, issued on March 30, 1998.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on January 18, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (3 Pages.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	4.29
CO	0.0
NO _x	0.0

- (a) The potential to emit (as defined in 326 IAC 2-1.1-3) of volatile organic compounds (VOCs) is less than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.1-1.

County Attainment Status

The source is located in Benton County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the

formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Benton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Benton County has been classified as attainment or unclassifiable for volatile organic compounds (VOCs). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.2
PM10	0.2
SO ₂	0.0
VOC	> 250.00
CO	0.3
NO _x	1.3

- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.
- (b) These emissions were based on the Part 70 Operating permit and other permits issued to this source.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.0	0.0	0.0	4.29	0.0	0.0
Total Emissions	0.0	0.0	0.0	4.29	0.0	0.0
PSD or Offset Significant Level	25	15	40	40	100	40

- (a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source was issued a Part 70 Operating Permit 007-7645-00010 on March 30, 1998.

Federal Rule Applicability

- (a) The flexographic tail printer (TP-49) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), because the tail printer is a flexographic printing press not a publication rotogravure printing press.
- (b) The flexographic tail printer (TP-49) is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR Part 63.820 Subpart KK) because the tail printer is not a major source for hazardous air pollutants(HAP), as defined in 326 IAC 14 and 40 CFR 63.2.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6(BACT)

The potential to emit (PTE) of the volatile organic compounds (VOCs) from the flexographic tail printer (TP-49) is less than twenty-five(25) tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-5-5(Graphic Arts Operations)

The potential to emit (PTE) of the volatile organic compounds (VOCs) from the flexographic tail printer (TP-49) is less than twenty-five(25) tons per year. Therefore, 326 IAC 8-5-5 does not apply.

Conclusion

The construction and operation of this flexographic tail printer (TP-49) shall be subject to the conditions of the attached proposed Exemption 007-11776-00010.